

Plaintiffs' Exhibit 11

(Redacted)

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 ALEXANDRIA DIVISION

4
5 UNITED STATES OF AMERICA,)
et al,)
6)
Plaintiffs,)
7) Case No.
-vs-) 1:23-cv-00108-LMB-
8) JFA
GOOGLE, LLC,)
9)
Defendant.)
10)

11
12 ** HIGHLY CONFIDENTIAL **
13

14
15 VIDEO RECORDED 30(b)(6) EXAMINATION

16 OF: GROUPM

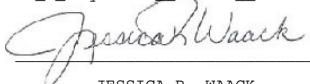
17 BY: SUSAN SCHIEKOFER

18
19 TAKEN ON
20 TUESDAY, SEPTEMBER 26, 2023
21

22 CERTIFIED STENOGRAPHER:

23 JESSIE WAACK, RDR, CRR, CCRR, NYRCR, NYACR,
CCR-NJ (No. 30XI008238700) CSR-TX (No. 11958)
24 CCR-WA (No. 21007264), CSR-CA (No. 14420),
REALTIME SYSTEMS ADMINISTRATOR
25 JOB NO.: 912924

Page 10	Page 12
<p>1 hmm. Does that make sense?</p> <p>2 A. Yes.</p> <p>3 Q. And then also, this is something 4 that's different from a normal question, 5 but try to let me finish my question before 6 you start giving your answer even if you 7 think you kind of know where I'm going.</p> <p>8 And similarly, I will try to let 9 you finish your answer before I start 10 asking the next question. Does that make 11 sense?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And if anything isn't 14 clear at any point, just ask me, and I'll 15 do my best to clear it up.</p> <p>16 A. Will do.</p> <p>17 Q. Do you understand that the 18 information you provide during this 19 deposition may be used by the Department of 20 Justice in other civil, criminal, 21 administrator or regulatory cases or 22 proceedings?</p> <p>23 A. I do.</p> <p>24 Q. You work in New York; is that 25 right?</p>	<p>1 A. Yes.</p> <p>2 Q. And if at any point you feel like 3 you have an answer to a question but it's 4 not based on your personal knowledge but 5 instead it's based on something you learned 6 to prepare, will you just let me know and 7 we'll kind of go from there?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Where were you born and 10 raised?</p> <p>11 A. I was born in Staten Island, 12 New York, and I was raised in Monmouth 13 County, New Jersey.</p> <p>14 Q. Okay. Can you describe your 15 educational background?</p> <p>16 A. Yes.</p> <p>17 I went undergrad to Montclair 18 University in New Jersey, and master's 19 in -- at NYU in New York.</p> <p>20 Q. Okay. What did you get your 21 master's in?</p> <p>22 A. English and American literature.</p> <p>23 Q. Okay. How did you first get into 24 advertising?</p> <p>25 A. I had an internship at a company</p>
Page 11	Page 13
<p>1 A. I do.</p> <p>2 Q. And you live in New York; is that 3 right?</p> <p>4 A. I live in New Jersey.</p> <p>5 Q. Okay. Is there an office where 6 you regularly work outside of New York?</p> <p>7 A. At home. I mean, we work three 8 days a week at 3 World Trade Center.</p> <p>9 Q. Okay.</p> <p>10 A. And then Mondays and Fridays from 11 home.</p> <p>12 Q. But outside of New York and 13 New Jersey, there's nowhere else where you 14 regularly work?</p> <p>15 A. No.</p> <p>16 Q. Okay. So for all of my 17 questions, I'd like you to answer based on 18 your personal knowledge.</p> <p>19 Does that make sense?</p> <p>20 A. Yes.</p> <p>21 Q. So unless I say otherwise, I'm 22 not asking you about information that you 23 learned in preparation for this deposition 24 from other people at GroupM.</p> <p>25 Does that make sense?</p>	<p>1 that used to be called Ted Bates when I was 2 19. And I did that. And then they offered 3 me a job when I graduated.</p> <p>4 Q. And today you work at GroupM; is 5 that right?</p> <p>6 A. Yes.</p> <p>7 Q. What's your title at GroupM?</p> <p>8 A. Chief digital investment officer.</p> <p>9 Q. Can you give us a brief 10 description of your responsibilities?</p> <p>11 A. I have a small team at the center 12 of GroupM. And there's agencies at GroupM, 13 and clients sit within agencies.</p> <p>14 And our team at the center works 15 with the client teams to figure out what 16 are the partners that we want to do 17 business with in terms of things like 18 pricing, first-to-markets, research, 19 basically to provide value for the clients 20 for the money that they're spending across 21 GroupM and the agencies.</p> <p>22 Q. Let me ask you a little bit about 23 each of those.</p> <p>24 So what do you and your team do 25 with respect to pricing?</p>

Page 182	Page 184
<p>1 this deposition today. We have no 2 further questions, so we just wanted to 3 say thank you, we appreciate it. 4 THE WITNESS: You're welcome. 5 MS. KLAUSNER: Great. 6 MR. HUNSDERGER: Thank you to the 7 witness and counsel. 8 MS. KLAUSNER: Thank you. 9 THE VIDEOGRAPHER: The time is 10 3:05 p.m. 11 We're off the record. 12 (Time noted: 3:05 p.m.) 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition over 4 carefully and make any necessary 5 corrections. You should state the reason 6 in the appropriate space on the errata 7 sheet for any corrections that are made. 8 After doing so, please sign the 9 errata sheet and date it. 10 You are signing same subject to 11 the changes you have noted on the errata 12 sheet, which will be attached to your 13 deposition. 14 It is imperative that you return 15 the original errata sheet to the deposing 16 attorney within thirty (30) days of 17 receipt of the deposition transcript by 18 you. If you fail to do so, the deposition 19 transcript may be deemed to be accurate 20 and may be used in court. 21 22 23 24 25</p>
Page 183	Page 185
<p>1 REPORTER CERTIFICATE 2 I, the undersigned, do hereby certify: 3 That SUSAN SCHIEKOFER was by me duly 4 sworn in the within-entitled cause; that 5 said deposition was taken at the time and 6 place herein named; and that the deposition 7 is a true record of the witness's testimony 8 as reported by me, a disinterested person, 9 and thereafter a total of 186 was 10 transcribed. 11 I further certify that I am not 12 interested in the outcome of the said 13 action, nor connected with, nor related to 14 any of the parties in said action, nor to 15 their respective counsel. 16 IN WITNESS WHEREOF, I have hereunto set 17 my hand this 26th day of September, 2023. 18 Signature: <u>X</u>_Requested <u>Waived</u> Not Requested  19 20 JESSICA R. WAACK 21 Registered Diplomate Reporter 22 Certified Realtime Reporter 23 California Certified Realtime Reporter 24 New York Realtime Court Reporter 25 New York Association Court Reporter 24 Notary Public, State of New York 25 CCR-NJ (No. 30XI008238700) CSR-TX (No. 11958) 24 CCR-WA (No. 21007264), CSR-CA (No. 14420)</p>	<p>1 DECLARATION UNDER PENALTY OF PERJURY 2 USA VS. GOOGLE 3 Date of Deposition: September 26, 2023 4 5 6 I, SUSAN SCHIEKOFER, hereby 7 certify under penalty of perjury under the 8 laws of the State of _____ that 9 the foregoing is true and correct. 10 11 Executed this _____ day of _____, 2023, 12 at _____. 13 14 15 _____ 16 SUSAN SCHIEKOFER 17 18 SUBSCRIBED AND SWORN BEFORE ME 19 THIS ____ DAY OF _____, 20_____ 20 _____ 21 NOTARY PUBLIC 22 MY COMMISSION EXPIRES: _____ 23 24 25</p>

185

1 DECLARATION UNDER PENALTY OF PERJURY

2 USA VS. GOOGLE

3 Date of Deposition: September 26, 2023

4

5

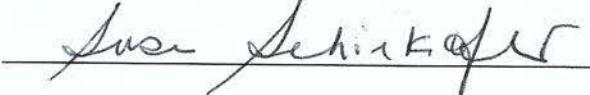
6 I, SUSAN SCHIEKOFER, hereby
7 certify under penalty of perjury under the
8 laws of the State of New York that
9 the foregoing is true and correct.

10

11 Executed this 2nd day of November, 2023,
12 at 279 Millburn Ave Millburn, NJ 07041

13

14

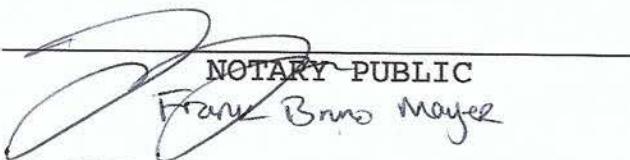
15 
SUSAN SCHIEKOFER

16

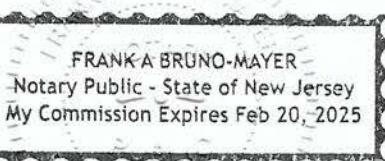
17

18 SUBSCRIBED AND SWORN BEFORE ME

19 THIS 2nd DAY OF November, 2023

20 
NOTARY PUBLIC
Frank A. Bruno-Mayer

21 MY COMMISSION EXPIRES: _____



PageID#
richtkoter

September 26, 2023

186

ERRATA SHEET

USA VS. GOOGLE

WITNESS: SUSAN SCHIEKOFER

Date of Deposition: September 26, 2023

Reason Codes: 1. Clarify the record
 2. Conform to the facts
 3. Correct transcription errors

SUSAN SCHTEKOFFER